



National Office
Council of State and Territorial Epidemiologists

July 11, 2025

Jeffrey M. Zirger
Information Collection Review Office
Centers for Disease Control and Prevention
1600 Clifton Road NE, MS H21-8
Atlanta, Georgia 30329

Re: Docket No. 2025-10516, Emergency Cruise Ship Outbreak Investigations (CSOIs)

Dear Mr. Zirger,

The Council of State and Territorial Epidemiologists (CSTE) agrees with a three-year approval for the Centers for Disease Control and Prevention (CDC) to reinstate the collection of information for the Emergency Cruise Ship Outbreak Investigations (CSOIs) activity for the CDC Vessel Sanitation Program (VSP) as described in the Federal Register Document 2025-10516.

CSTE is a national organization representing all states and territories and over 3,500 applied public health epidemiologists. CSTE's vision is to achieve thriving and healthy people and communities everywhere and our mission is to advance the field of applied epidemiology to maximize health. CSTE champions expansion of applied epidemiology capacity and effective use of epidemiologic data to guide public health practice, implement science-based policy, and improve health. CSTE has a vested interest in promoting rules, regulations, and policies that advance health for all Americans, using robust public health surveillance and epidemiology practice. Public health action by CSTE member states has led to improvements in clinical practice, medical procedures, surveillance, detection and control of public health threats, and the ongoing development of evidence-based disease control policies and prevention successes, including multiple position statements to standardize national surveillance efforts.

CSTE fully supports CDC's continued collection of information for CSOIs. CDC's approval to gather information through CSOIs is necessary for the proper performance of CDC functions and is of practical utility to CDC's mission to protect Americans from health and security threats. Collected data are used to plan, implement, and evaluate public health interventions aimed at reducing negative health and economic impacts. CDC has unparalleled, unique experience and expertise not available anywhere else in the federal government that is necessary to perform this function. CDC provides an essential role in investigating and responding to acute gastroenteritis outbreaks associated with cruise ships to minimize the risk of illness to Americans and other passengers on these vessels.

Thank you for considering these comments on behalf of our members working in state, Tribal, local, and territorial (STLT) health agencies. Should you like to discuss these comments further, please contact me at letters@cste.org or (770)458-3811.

Sincerely,

Janet Hamilton, MPH
Executive Director
Council of State and Territorial Epidemiologists